

NOV 16 2023

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

ALEXANDER COLEMAN,

Defendant.

))))))))))

No.

4:23CR647 JAR

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Tracy L. Berry, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3142(d).

As and for its grounds, the Government states as follows:

1. Defendant is charged with the non-violent offense of making a false statement, Title 18, United States Code, Section 1001(a)(2).
2. Pursuant to Title 18, United States Code, Section 3142(g), the weight of the evidence against defendant, defendant's history and characteristics, and the nature and seriousness of the danger to any person or the community that would be posed by defendant's release, warrant defendant's detention pending trial.
3. The defendant is a risk of flight because Defendant has a history of substance abuse and has an untreated mental health condition.

4. Defendant poses a risk of danger because of multiple arrests for sexual offenses and an extensive history of illicit drug use.

4. Defendant engaged in the charged conduct while serving a term of supervised release in criminal case number 4:18CR00218 JAR.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required, the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

s/Tracy L. Berry
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